REMARKS

In the Office Action¹, the Examiner rejected claims 1-22 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,953,724 to Lowry et al. ("*Lowry*"). In the present Amendment, Applicants amend claims 1, 4, 5, 15, 21, and 22.

Applicants respectfully traverse the Examiner's rejection of claims 1-22 as allegedly being anticipated by *Lowry*. *Lowry* fails to disclose each and every element of any of claims 1-22, as required to sustain a rejection under 35 U.S.C. § 102(b). For example, *Lowry* at least fails to teach the claimed "display configured to output a first area of the parent class ... including all of the second area of each child class" (emphasis added) as recited in claim 1.

Lowry discloses a hierarchical graphical chart 50 formed from records in a global database library (Lowry, abstract). Lowry's chart 50 includes "[n]odes 52 that are at different hierarchical levels 54 and are linked by branches 56 [and] are sometimes referred to as having parent/child relationships" (Lowry, col. 4, lines 61-63). Lowry's chart can be created using a chart manager user interface 90 to define chart 50 (Lowry, FIG. 5A and col. 7, lines 48-58).

The Examiner relies up on *Lowry's* chart 50 as allegedly corresponding to the claimed display, and *Lowry's* node as corresponding to the claimed first area second

¹ The Office Action contains statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

area (Office Action at p. 4). However, *Lowry's* chart does not include a node that includes all of another node. Therefore, *Lowry* fails to teach a "display configured to output a first area of the parent class ... <u>including all of the second area of each child</u> class" (emphasis added) as recited in claim 1.

Claim 1 also recites "the first area including all of the second area of each child class to indicate an <u>inclusion relationship</u> between the parent class and the child class" (emphasis added). *Lowry* also fails to disclose at least this element.

Lowry cites Windows Explorer as an example of a "graphical representation that indicates hierarchical relationships between data storage drives, file directories or folders, and files" (Lowry, col. 1, lines 55-65). Lowry's chart is distinguishable from Windows Explorer because Lowry's chart is generated using null node lines 100 to represent multilevel steps between immediately adjacent nodes (Lowry, col. 8, lines 17-20). Lowry's chart is also distinguishable from Windows Explorer because Lowry's chart is generated using branch nodes 101 to breach hierarchical relationships between higher and lower level nodes (Lowry, col. 8, lines 48-51). However, like Windows Explorer, Lowry does not illustrate inclusion relationships between classes.

Lowry also discloses that the chart 50 can be built using basic graphic objects such as lines, boxes, and frames provided in languages such as C++, Visual Basic, and Delphi (Lowry, col. 14, lines 61-64). The Examiner relies upon this disclosure in asserting that Lowry does display parent/child inclusion relationships (Office Action at p. 5). The Examiner's reliance is misplaced. Lowry's discussion of C++ and other

languages is directed to programming languages used to <u>draw</u> the objects chart 50.

Lowry does <u>not</u> disclose that the chart 50 itself represents any inclusion relationships whatsoever between a parent class and a child class, in C++ or any other language.

Indeed, the Examiner's interpretation that chart 50 illustrates inclusion relationships between the C++ line, box, and frame objects suggests that chart 50 should have nodes representing each of the line, box, and frame objects. Instead, the nodes in chart 50 do not represent C++ line, box or frame objects, but are merely drawn using line, box, and frame objects provided by various programming languages, such as C++. Therefore, *Lowry* does not disclose a "first area including all of the second area of each child class to indicate an inclusion relationship between the parent class and the child class" (emphasis added) as recited by independent claim 1.

Claim 1 also recites "a memory configured to hierarchically store a database for the plurality of classes each having properties, each class representing a concept characterized by the properties, the properties of a parent class in the plurality of classes being <u>inherited</u> to each child class belonging to the parent class" (emphasis added). *Lowry* also fails to disclose this element.

By contrast, *Lowry* discloses a node properties table 4 that includes information on each node in chart 50 (*Lowry*, col. 15, lines 14-16). Node properties table 4 includes information such as node level, which indicates the chart level where the node resides, and node top and node left, which indicate the location of the node on the display (*Lowry*, col. 15, table 4, and col. 9, table 2). The Examiner relies upon table 4 to

support the proposition that "node property whether parent node or child node is integral part of *Lowry's* teaching" (Office Action at p. 4). Notwithstanding the Examiner's contention, table 4 simply describes how the nodes are displayed. Table 4 fails to indicate that any of the properties in table 4 is <u>inherited</u> from a parent node to a child node.

The Examiner's interpretation of *Lowry's* teachings with respect to inheritance is also inconsistent with *Lowry's* underlying data format. *Lowry* discloses a global database library including multiple records, each of which includes several generic key fields 126 and a type field 128 (*Lowry*, col. 9, lines 41-48 and FIG. 6). The type field 128 allows generic key fields 126 to assume different characteristics according to the type (*Lowry*, col. 9, lines 45-48). It follows that the generic key fields themselves include no type information and, therefore, when the type fields associated with the records are changed, the records carry different characteristics. Accordingly, *Lowry* does not disclose any inheritance of properties between the records used to generate chart 50. Therefore, *Lowry* does not disclose "properties of a parent class in the plurality of classes being <u>inherited</u> to each child class belonging to the parent class" (emphasis added), as recited by independent claim 1.

Amended claim 1 is, therefore, allowable over *Lowry* and claims 2-20 are allowable at least due to their dependence from claim 1. Claims 21 and 22, while of different scope, recite features similar to those recited in claim 1. Claims 21 and 22, therefore, are allowable at least for reasons discussed above in regard to claim 1.

Application No. 10/717,707 Attorney Docket No. 05225.0253-00

Accordingly, Applicants request that the Examiner withdraw the rejection of claims 1-22 under 35 U.S.C. § 102(b) and allow the claims.

In view of the foregoing remarks, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, L.L.P.

Dated: December 13, 2007

Reg. No. 31,744